REMARKS

Claims 1, 3-14, 19-24 and 26 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 1, 3-9, 11-13, 19, 20, 22-24 and 26 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Zaharkin (U.S. Patent Application Publication No. 2002/0147747) (hereinafter "Zaharkin"), in view of Wang et al. (U.S. Patent No. 6,822,663), in further view of Sorge et al. (U.S. Patent No. 6,613,098) (hereinafter "Sorge").

Claims 10, 14 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Zaharkin. The rejections are respectfully traversed.

It should first be noted that the rejections to claims 10, 14, and 21 seem to be incorrect as they are rejected based only on Zaharkin, although they depend from base claims rejected by the combination of Zaharkin, Wang and Sorge.

Regarding independent claims 1 and 22, the Office Action cites the Abstract and col. 8, lines 7-25 of Wang as teaching "a source of *transformation parameters determining a desired presentation style and content structure* of an output document." Wang teaches transforming existing web pages for display on an internet appliance. (Wang, Abstract). Wang provides a graphical editing tool by which *a human web designer* identifies information components. (Wang, Abstract). The information components are graphically arranged into a result area according to the capabilities of the internet appliance. (Wang, Abstract). Then, a set of transformation rules are generated according to the arranged result area. (Wang, Abstract).

The claimed invention differs significantly from Wang. In the claimed invention, the "transformation parameters" are what determine the desired presentation style and content structure" of the output document. In stark contrast, in Wang, the transformation rules are *subsequently generated* based on (1) a human web designer's *prior* choice of information

components (i.e., a human chooses the content from the source) and (2) a *prior* graphical arrangement based on the capabilities of the internet appliance.

Further, Wang teaches that its transformation rules are used for transforming the original *source content* of an existing web page into a result content of an internet appliance. This is distinguishable from the presently claimed invention, which claims "transforming said *intermediate document structure* into the output document with said desired presentation style of a second format in response to said transformation parameters." Wang does *not* teach the presence of an intermediate document structure, much less using its transformation rules for transforming an intermediate document structure.

The Office Action cites paragraphs [0025], [0034], [0036], and [0037] of Zaharkin as teaching "transforming a received input document in a first format by *parsing said input document and collating elements of said input document into a hierarchically ordered structure* representing an intermediate document structure," as claimed in claims 1 and 22. Particularly, the Office Action contends that the mapping file taught by Zaharkin renders obvious the "intermediate document structure" of the presently claimed in invention. Applicants respectfully disagree.

Paragraph [0034] of Zaharkin describes the mapping file in its entirety:

> [0034] Next, method 300 entails creating a mapping file 310. The mapping file contains all of the locations of the DTD elements in the input file as specified by the markup rules. The mapping file includes one or more nodes, each node representative of a possible mapping of an element of document type definition to a portion of the document. The mapping file is generated from the document and the document type definition. *Subsequently, method 300 includes generating one or more candidate paths from the mapping file. Each candidate path represents a possible path from one node in the mapping file to another node in the mapping file.*

The mapping file contains (1) locations of the DTD elements in the input file as specified by the markup rules, and (2) nodes representative of a *possible* mapping of an element of the

DTD to a portion of the document. Nothing is stated in Zaharkin about *parsing* the input file or *collating* elements of the input file to form the mapping file.

It should be noted that after the italicized portion above indicates the end of the description of the description in Zaharkin of the mapping file. Paragraphs [0036] and [0037] of Zaharkin do not refer to the creation of the mapping file, but rather to the results of applying the mapping file (e.g., candidate paths are generated from the mapping file).

It should further be noted that there is no teaching that the mapping file of Zaharkin (i.e., the combination of locations and nodes) is organized in "a hierarchically ordered structure representing an intermediate document structure," as claimed in claims 1 and 22. The only mention in Zaharkin about hierarchical structures is in paragraph [0036], which states that "DTDs are commonly structured as a hierarchical tree." However, this is irrelevant to the mapping file of Zaharkin which contains *locations* of DTD elements and not the DTD elements themselves. Further, Zaharkin expressly differentiates DTD elements from the document itself when it refers to "each node representative of a possible mapping of an *element of document type definition* to *a portion of the document*" in paragraph [0034].

Regarding independent claim 1, the Office Action relies on Sorge as teaching "*a preprocessor* for resolving conflicts arising due to said transformation parameters in accordance with *predetermined conflict resolution rules* and wherein said transformation processor transforms said intermediate document structure into said output document with said desired presentation style of said second format *in response to transformation parameters processed in accordance with said conflict resolution rules*." In particular, the Office Action points to col. 12, lines 35-67 and col. 13, lines 1-34 of Sorge. Sorge discloses that "[i]f there is a formatting conflict, ...EXCEL 2000 resolves the conflict.". (Sorge, col. 12, lines 46-48). It should be noted

that EXCEL 2000 is a *spreadsheet program* which bears absolutely no relation to transformation parameters "for transforming *said intermediate document structure* into the output document with said desired presentation style of a second format," as claimed in claim 1. Further, EXCEL 2000 is an *application* program, and not a claimed "preprocessor."

Regarding claim 22, because Sorge teaches that EXCEL 2000 itself resolves any formatting conflict rather than adjusting transformation parameters, then it follows that Sorge does *not* teach "resolving conflicts arising due to said transformation parameters in accordance with predetermined conflict resolution rules *to produce compatible transformation parameters*."

The Examiner's citation to Sorge, which is entirely unrelated to the presently claimed invention, is nothing more than a textbook example of selectively picking and choosing elements from disparate references using impermissible hindsight. Nothing in Sorge indicates that its conflict resolution scheme (i.e., resolve conflicts using EXCEL 2000) would even apply to the combination Zaharkin and Wang. It should be noted that neither Zaharkin nor Wang teaches its use with spreadsheet data.

The arguments provided above for claims 1 and 22 apply, at least in part, for independent claims 19 and 24. Additional arguments are provided below.

Regarding claims 19 and 24, the Office Action cites col. 11, lines 20-59 of Wang as teaching "receiving user-provided input data selecting a second format from *a plurality of selectable formats* for presentation on a display device" and "receiving a user-selected second format from *a plurality of selectable formats*." However, Wang teaches conversion from a source format of a web page to a result format of an internet appliance. Wang provides no selectable formats. The recited portion of Wang teaches the selection and application of templates, which is entirely unrelated to the format of the document itself. It should be noted

that claim 24 *expressly* distinguishes the document "format" from the "template document," yet the Examiner uses the same exact rejection for both elements of the claim without distinction.

Further, the Office Action cites col. 1, lines 20-59 and col. 8, lines 9-25 as teaching "receiving user-provided transformation parameters determining a desired presentation layout and content structure," as claimed in claim 19. Wang teaches that a "transform rule is *generated* for every such URL." Nothing in Wang teaches "*receiving* user-provided transformation parameters."

Regarding claim 24, the Examiner provides the same exact citations in Zaharkin as provided for claims 1 and 22 for "converting said intermediate document structure into the output document of the second format, the output document with said desired presentation layout and content structure *corresponding to said template document and said transformation parameters*." The Examiner essentially ignores the element of the "template document" of the claim.

Accordingly, independent claims 1, 19, 22 and 24 are believed to be patentably distinguishable over Zaharkin, Wang and Sorge, individually or in combination. The corresponding dependent claims are believed to be allowable at least for the reasons given for the independent claims. Withdrawal of the rejection of claims 1, 3-14, 19-24 and 26 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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